

**MEMORANDUM**

To: Kent Gray, Director, DERR

From: Jason Knowlton, Environmental Scientist, DERR

Date: December 16, 1994

Subject: Summary of the Leeds Silver Reclamation Site

I have not been able to obtain a copy of the 4-page letter from the Environmental Protection Agency (EPA) to 5M Corporation that was referenced in the letter from Representative Met Johnson to John Giedt of the EPA (attached). Very likely, this is in reference to the Leeds Silver Reclamation Site, being investigated by the Superfund Branch. 5M Corporation has been identified by the EPA as a potentially responsible party for this site. Following is a description and summary of activities at the Leeds site.

The Leeds Silver Reclamation Site is an abandoned ore processing facility located approximately 1 mile northwest of Leeds, Utah, in the Silver Reef Mining District. The site consists of 3.8 acres of ore material deposited on a leach pad and 2 leachate collection ponds. 5M, Inc. of Hurricane, Utah currently owns the facility, although part of the leach pad was constructed on property owned and administered by the Bureau of Land Management. Environmental and health concerns include the potential for heavy metals to migrate off-site to an adjacent wetland, and on-site exposure to highly acidic ( $\text{pH} < 2$ ) waters in the collection ponds.

5M, Incorporated, activities were apparently coordinated with the Utah Division of Oil, Gas and Mining (DOGM) and the Utah Bureau of Water Pollution Control (BWPC) prior to CERCLA involvement. Several construction or pre-construction meetings were apparently held between these parties in 1978. The DOGM was in control of a surety bond surrendered by a former site operator for about \$43,000 for site reclamation.

The site was discovered into CERCLIS, 10/29/86, due to concern by Utah Division of Water Resources over tailings potentially washing into Quail Creek Reservoir. A Preliminary Assessment Report was prepared by the Division of Environmental Response and Remediation (DERR), 12/17/87, which outlined concern for potential contamination of surface water and soil. Sampling was conducted at the site, 7/31/90, by the DERR; soil/tailings, sediment, surface water, and ground water samples were submitted for heavy metals and radionuclide analyses.

An Analytical Results Report was prepared by the DERR, 10/30/91, which identified several potential threats to human health and the environment from site conditions. The DERR recommended in the cover letter to EPA that the EPA Emergency Response Branch (ERB) assess the site.

The EPA-ERB began assessing the site on 2/4/92. A site visit was conducted with DERR, DOGM, and EPA-ERB in attendance. EPA-ERB indicated that further work would be conducted to more fully assess ecological threats associated with the site. A memo from the EPA toxicologist to ERB, 4/15/92, indicated that potentially significant risks to human health and the environment may be present from the highly acidic water at the site. An EPA-ERB environmental/ecology/wetlands specialist visited the site on 05/05/92 and recommended, in a 7/92 report, "Field Reconnaissance and Wetland Assessment of the Leeds Silver Site," further site characterization, including sampling and an ecological assessment.

On 10/23/92, David Moore, President of the Hidden Valley Water Users Association (HVWUA), stated that he believed that the site was contaminating a drinking water well located near the southeast corner of the site. The Utah Division of Drinking Water (DDW) later condemned this well due to exceedances of uranium and biological parameters. On 05/06/93 The DDW hosted a public meeting to attempt to allow HVWUA water users to connect to the Leeds water system. Tests of the well and an overall review of site conditions conducted by EPA indicated that the site was not the likely source of contaminants in the well. Instead, it was suspected that the well had been constructed and screened in tunnels of the extensive underground mining operations which had been conducted in the area. Residents of the HVWUA are currently connected to another drinking water system.

ERB initiated enforcement and planning activities 12/14/92, preparing an Inter-Agency Agreement (IAG) with the Bureau of Reclamation (BOR) for BOR to conduct a Value Engineering (VE) study of possible site stabilization measures. A "Preferred Plan Remediation Report" was prepared by the BOR for EPA, and forwarded to the DERR by EPA 10/4/94, which outlines conceptually work to be performed to clean up the site. Proposed activities are to include the dewatering of on-site ponds and capping of the heap-leach pile. Work is expected to commence early in 1995.

The EPA-ERB continues to work closely with the DERR, apprising us of current activities and seeking comment on proposed actions.

cc: Steven Thiriot  
Brad Johnson

STATE OF UTAH

REP. MET JOHNSON  
74th DISTRICT  
WASHINGTON COUNTY,  
P.O. BOX 560  
NEW HARMONY, UTAH 84787  
RES 308-4230



CC: DEQ  
K Brown  
Kevin - have  
seen the CE  
COMMITTEES: BUSINESS, LABOR AND ECONOMIC  
DEVELOPMENT, ENERGY, NATURAL RESOURCES AND  
AGRICULTURE, NATURAL RESOURCES AND ENERGY  
APPROPRIATIONS SUBCOMMITTEE

December 3, 1994

John R. Giedt  
United States EPA Region 8  
999 18th Street, Suite 500  
Denver CO 80202-2466

Dear Mr. Giedt:

A copy of your letter to SM Corporation has been shared with me. I am amazed at the bureaucratic arrogance within those four pages. I suggest you might contact the DEQ in Utah. They have had a great deal to do with the situation in that area.

I have first-hand knowledge of the entire situation and was instrumental in helping the Hidden Valley Water Company find a new source of water. At the time I was helping, which took about one year, I saw repeated documents and evidences where SM had performed and participated in a variety of actions that were positive and beneficial. They even went so far as to warn the developers of Hidden Valley, as well as the State, that the water in the area they had chosen to drill had minerals in excess of what would be safe for drinking.

I suggest that you begin again in dealing with SM and with a coordinated effort with the BLM and with the state of Utah DEQ. In my opinion, this is an inappropriate way for any agency, federal or state, to behave and/or mandate. I would appreciate very much a response in writing from you. Thank you.

Sincerely,

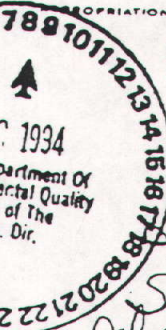
Met Johnson  
State Representative  
District #74

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DEC 14 1994

Utah Department of  
Environmental Quality  
Division of Drinking Water

cc: SM, Inc., Commissioner Russell Gallian, Governor Leavitt  
c/o Bob Linnell, Diane Nielsen, DEQ, Ted Stewart, DNR



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